

REMARKS

Applicants have carefully studied the outstanding Office Action. The present submission is intended to be fully responsive to the rejection raised by the Office Action and is believed to place the application in condition for allowance. Further, Applicants do not acquiesce to any of the Office Action rejections not particularly addressed. Favorable reconsideration and allowance of the application is respectfully requested.

Claim Rejections under 35 U.S.C. §102

Claims 1-20 stand rejected under 35 U.S.C. §102(e) as being anticipated by *Minear et al.* (U.S. Patent No. 6,101,189). Claims 1, 10, and 20 have been amended. Applicants respectfully submit that *Minear* does not disclose, teach, or even suggest the presently claimed application.

As an initial matter, it is important to keep in mind that all of the pending claims recite a Security Association ("SA") between an internal network device and an external network device that are connected via a router/gateway. For example, Claim 1 of the present application recites "providing a first network device [internal network device] and a second network device [router/gateway] on a first network" and "establishing a security association [SA] between the first network device [internal network device] and a third network device [external network device] on a second network external to the first network." As known in the art, the SA ensures that packets are secure between the entire end-to-end path of the communication between the internal and external network devices (i.e., the network devices for which the SA was established). Securing only a portion of the communication path, such as between only the internal network device and the router/gateway, between only the external network device and the router/gateway, or between only a pair of routers/gateways, **does not** constitute an SA

between the internal and external network devices. Consequently, as explained more fully below, *Minear* does not anticipate or render obvious the present claims.

Minear discloses a system for regulating the flow of messages through a firewall including establishing a secure communication tunnel between two firewalls for firewall-to-firewall encryption. See *Minear*, Abstract and col. 3 lines 50-51. *Minear* does not disclose a secure communication channel, however, between an internal network device and an external network device that are connected via a router/gateway.

Contrary to the Examiner's assertion, *Minear* does not "establish[] a security association between the first network device and a third network device on a second network external to the first network." See Office Action, p. 3. The Examiner identifies workstation H1 in *Minear* as a "first network device," firewall 14 (SW1) as a "second device," and workstation H3 in *Minear* as a "third network device." However, Figure 3 of *Minear* clearly illustrates that there is no security association present between the two workstations H1 and H3. Packets are encrypted only between firewalls 14 (SW1) and 18 (SW2), and are decrypted before they reach H1 and H3. Therefore, at best a security association merely exists between the second device and an additional device, firewall 18 (SW2). Thus, there is no end to end security association between the first workstation and the third workstation, as recited in the present claims, and *Minear* does not anticipate independent claims 1, 10, and 20.

Claims 2-9 and 11-19 are dependent on claims 1 and 10, and are therefore allowable for at least the reasons described with reference to claims 1 and 10.

Conclusion

Applicants respectfully submit that, in view of the remarks above, the present application,

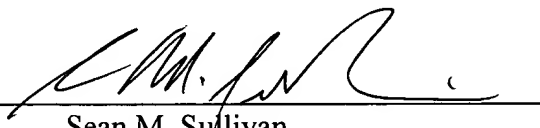
including claims 1-20, is in condition for allowance, and Applicants solicit action to that end.

If there are any additional matters which may be resolved through a telephone interview, the Examiner is respectfully requested to contact Applicants' undersigned representative.

Respectfully submitted,

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